

EXHIBIT C

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March 10, 2008

Hon. George A. Yanthis
U.S. District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: Buckley v. Philips Electronics North America Corp.,
et al.,
USDC:SDNY Case No.07 Civ. 6775(SCR)
Request for Pre-Motion Conference

Dear Judge Yanthis:

I respectfully request a pre-motion conference in anticipation of filing a motion to amend my complaint in the referenced law suit. Defendants have refused to stipulate to my request to amend the Complaint.

I seek to amend to clarify that portion of my Complaint which alleges that defendant's age discrimination interfered with the attainment of my rights to pension and welfare benefits provided by defendants. It is currently not clear that I contend that defendant's interference with these rights violates Section 510 of the Employee Retirement Income Security Act of 1974 ("ERISA"). I also seek to amend to change the form of the Complaint from the "canned" format provided on the District Court's web site to a "standard" format.

An Amended Complaint will not substantially prejudice defendant's rights for the following reasons:

- a. the substance of the financial injury and age discrimination to be asserted in the Amended Complaint are substantially identical to those claimed in the

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original Complaint.

b. the change to a "standard" Complaint format will tend to eliminate disputes over form that would tend to waste this Court's time and, in fact, will operate to facilitate defendant's preparation of its defense.

c. the Amended Complaint will be filed at an early stage of Discovery. At this point, defendants have only filed interrogatories and demands for document production. No depositions have been taken.

d. my benefit interference position is well known to defendants. In fact, the communication to defendants of my claim and the facts supporting it pre-date the filing of the law suit by at least thirty-three months. I do not seek to alter either the amount of damages claimed or the age discrimination which triggered those damages.

Finally, I believe my proposed motion for leave to amend falls squarely within the intent of Section 15(a) of the Federal Rules of Civil Procedure. An Amended Complaint will not prejudice defendant's rights. ✓

I am available to meet at your convenience.

Very truly yours,

A handwritten signature in black ink, appearing to read "John W. Buckley". The signature is fluid and cursive, with a large loop at the end of the last name.

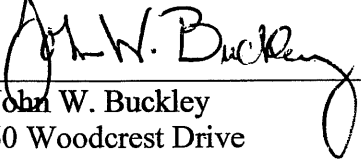
John W. Buckley

Certificate of Service

Case No. 07 Civ. 6775(SCR)

I, JOHN W. BUCKLEY, hereby declare under penalty of perjury, that on March 10, 2008, I served a copy of the foregoing letter upon Michael P. Benanti, Esq. with offices at Bleakley, Platt & Schmidt, One North Lexington Avenue, White Plains, New York 10601 via first class mail.

Dated: Hopewell Junction, New York
March 10, 2008



John W. Buckley
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